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AUG 15 2018

UNITED STATES DISTRICT COURT

for the

Western District of Washington

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)Hotmail Account: advent@hotmail.co.jp controlled by Microsoft
Corporation, located at One Microsoft Way, Redmond,
WA 98052

Case No. MJ18-369

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A, attached hereto and incorporated herein by reference.

located in the Western District of Washington, there is now concealed (identify the person or describe the property to be seized):

See Attachment B attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☐ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Offense Description

18 U.S.C. §§ 1028(a)(7); 1028A; 1029(a)(2) Identity Theft; Aggravated Identity Theft; Access Device Fraud
18 U.S.C. §§ 1030(a)(4); 1343 Computer Fraud; Wire Fraud
18 U.S.C. § 1956 Money Laundering

The application is based on these facts:

See Affidavit of Special Agent Joel Martini, attached hereto and incorporated herein by reference.

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Applicant's signature

JOEL MARTINI Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/15/2018

City and state: Seattle, Washington

Judge's signature

James P. Donohue, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

STATE OF WASHINGTON)

) ss

COUNTY OF KING)

I, Joel Martini, being first duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI), currently assigned to the Seattle Field Office, and have been so employed for approximately 1 year. I am assigned to the Cyber squad where I primarily investigate computer intrusions and other Cybercrimes. My experience as an FBI Agent includes the investigation of cases involving the use of computers and the Internet to commit crimes. I have received training and gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, Cybercrimes, computer evidence identification, computer evidence seizure and processing, and various other criminal laws and procedures. I have personally participated in the execution of search warrants involving the search and seizure of computer equipment. I have received advanced training in the acquisition and analysis of digital evidence (both network and host based), responding to computer intrusions and other incidents. I currently hold a Bachelor of Science in Information Systems from Corban University.

2. Prior to my employment as a Special Agent, I worked as a Computer Forensic Examiner for the FBI for approximately 5 years. As part of that employment, I became familiar with the design and operations of various electronic devices, networks, and websites, including technology described herein.

3. I make this affidavit in support of an application for a search warrant for information associated with a certain account that is stored at premises controlled by an electronic communications service and remote computer service provider, namely, Microsoft Corporation ("Microsoft"), located at Redmond, Washington (generally, "SUBJECT ACCOUNT"). The information to be searched is described in the following paragraphs and

1 in Attachment A, which are incorporated herein. This affidavit is made in support of an
2 application for a search warrant under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and
3 2703(c)(1)(A) to require Microsoft to disclose to the government copies of the information,
4 including the content of communications, further described in Section I of Attachment B,
5 pertaining to the following account or user identifier, identified in Attachment A:

6 **advent@hotmail.co.jp ("SUBJECT ACCOUNT #9")**

7 Upon receipt of the information described in Section I of Attachment B, government-
8 authorized persons will review that information to locate the items described in Section II of
9 Attachment B. This warrant is requested in connection with an on-going investigation in this
10 district by the Seattle Field Office of the Federal Bureau of Investigation (FBI).

11 4. The facts set forth in this Affidavit are based on my own personal knowledge;
12 knowledge obtained from other individuals during my participation in this investigation,
13 including other law enforcement personnel; review of documents and records related to this
14 investigation; communications with others who have personal knowledge of the events and
15 circumstances described herein; and information gained through my training and experience.
16 Because this Affidavit is submitted for the limited purpose of establishing probable cause in
17 support of the application for a search warrant, it does not set forth each and every fact that I
18 or others have learned during the course of this investigation.

19 5. Based on my training and experience and the facts as set forth in this affidavit,
20 there is probable cause to believe that violations of Title 18, United States Code, Sections
21 1028(a)(7) (Identity Theft); 1028A (Aggravated Identity Theft); 1029(a)(2) (Access Device
22 Fraud); 1030(a)(4) (Computer Fraud); 1343 (Wire Fraud); and 1956 (Money Laundering)
23 have been committed by an individual known as "Matthew Ho," as described below, as well
24 as perhaps other unknown persons. There is also probable cause to search the information
25 described in Attachment A for evidence, instrumentalities, contraband or fruits of these
26 crimes, as described in Attachment B.

TECHNICAL TERMS

6. Based on my training and experience, I use the following technical terms to convey the following meanings:

a. **IP Address:** An Internet Protocol address (or simply "IP address") is a unique numeric address used by devices, such as computers, on the Internet. Every device attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that device may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses.

b. **Internet:** The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

c. **Cloud Computing:** Cloud Computing is the practice of using a network of remote servers hosted on the Internet to store, manage, and process data, rather than a local server or a personal computer.

d. **Cryptocurrency:** Cryptocurrency is a digital currency in which encryption techniques are used to regulate the generation of units of currency and verify the transfer of funds, operating independently of a central bank. Decentralized cryptocurrencies such as Bitcoin now provide an outlet for personal wealth that is beyond restriction and confiscation.

e. **Cryptocurrency Mining:** Cryptocurrency mining is the process by which transactions are verified and added to the public ledger, known as the block chain, and also the means through which new Bitcoin are released.

SUMMARY OF PROBABLE CAUSE

A. Overview

7. The FBI is conducting an investigation into a suspected fraud scheme, believed to have been conducted by and through one or more foreign actors. As discussed below, the FBI received information from multiple U.S. companies regarding the theft and misuse of

1 services through the unauthorized use of another person's identity and stolen credit card.

2 The primary suspect, identified as "Matthew Ho" (and hereafter referred to as such), is
3 believed to be a resident of Singapore and the user of **advent@hotmail.co.jp (SUBJECT**
4 **ACCOUNT #9)**, as well as multiple other accounts, some of which are described herein.

5 8. More specifically, in about October 2017, one or more suspects impersonated
6 and used without authorization personal information of a real person residing in the state of
7 California, Marc Merrill, including his name, address, and credit card information, along
8 with a seemingly authentic email account, namely, **mnmmerrill25@gmail.com (ACCOUNT**
9 **#1)**, to open accounts at multiple online service providers, such as Google and Amazon.

10 Merrill is the co-founder and current co-chairman of Riot Games, a video game developer
11 and eSports tournament organizer based in Los Angeles, California.

12 9. Thereafter, according to the providers, Ho used fraudulently created cloud
13 services accounts primarily, if not exclusively, as part of a large-scale cryptocurrency mining
14 operation,¹ and in doing so accrued multiple millions of dollars in unpaid cloud service fees
15 and charges. Some of the past due balances were charged to Merrill's credit card, some of
16 which the accountholder paid before the fraud and compromise of the credit card account
17 were discovered.

18 **B. Summary of Investigation**

19 10. In February 2018, Amazon Web Services (AWS), Amazon's cloud services
20 subsidiary,² contacted the FBI Seattle Office regarding suspected fraud. According to
21 information provided by AWS, on about January 22, 2018, AWS closed a particular cloud
22

23
24 ¹ Based on my training and experience and that of other experienced investigators, I know that
25 cryptocurrency mining potentially can prove lucrative particularly given the recent escalation in
26 popularity, and value, of various cryptocurrencies, such as Bitcoin and Ethereum. I also know that
27 current mining practices typically require a large amount of processing power and data usage. In
28 fact, some miners pool resources, sharing their processing power over a network to split the reward.

² Amazon is an electronic commerce and cloud computing company based in Seattle, Washington,
within the Western District of Washington. Amazon Web Services (AWS) is a subsidiary of
Amazon.com that provides on-demand cloud computing platforms to individuals, companies and
governments, on a paid subscription basis.

1 computing account ("MERRILL ACCOUNT") after identifying several strong indications of
2 fraud. The MERRILL ACCOUNT was opened on about November 2, 2017, under a
3 fraudulent association to an existing, legitimate corporate AWS customer, Riot Games,
4 through use of Merrill's identity and credit card and a fraudulent email account meant to
5 appear legitimate, specifically, mnmerrill25@gmail.com (ACCOUNT #1).

6 11. According to AWS, through social engineering and the use of Merrill's identity
7 and credit card information, the suspect was able to gain access to substantially elevated
8 levels of cloud computer services. As explained by AWS to investigators,

9 Mr. Merrill is the co-founder and President of Riot Games, a video game
10 developer, eSports tournament organizer and publisher. While Riot Games is
11 an AWS customer, the fraudulent account was not a compromise of the Riot
12 Games corporate AWS account. The fraudster used sophisticated social
13 engineering techniques, relying on Mr. Merrill's relationship with AWS and his
14 high net worth to convince AWS employees that this account was legitimate.
15 Additionally, a payment of \$135,860.99 was made on 12/03/2017 using the
16 American Express card registered on the account. It is not known if this card
17 was stolen or compromised, but it had been previously used on other accounts
18 associated with Riot Games. The large payment combined with several
19 convincing "customer" contacts allowed this sophisticated fraudster to go
20 undetected for two months.

21 As noted above, according to AWS, the impersonation of Merrill specifically and AWS's
22 existing cloud service customer relationship with Merrill's company, coupled with a sizeable
23 initial payment charged to Merrill's credit card, American Express ("Amex") ending in -
24 93007, deceived AWS into granting Ho access to an elevated level of cloud computing
25 resources and data usage.

26 12. According to AWS's initial estimates conveyed to investigators, the fraudulent
27 AWS MERRILL ACCOUNT accrued a balance of roughly \$5 million in commercial cloud
28 computing services. AWS conveyed its belief that the MERRILL ACCOUNT was used for
cryptocurrency mining based on the data usage volume and patterns.

13 13. AWS provided investigators with several identifiers and IP addresses and a
14 copy of what was determined to be a fake California driver license bearing Merrill's name

provided as verification to open the MERRILL ACCOUNT. AWS further provided the name "Matthew Ho" as a suspect based on its preliminary internal investigation.

14. As part of this investigation, I have reviewed account records for Merrill's Amex account, ending in -93007, which was used to register the fraudulent AWS MERRILL ACCOUNT, described above. The account belongs to Merrill and presumably his spouse. On December 3, 2017, there is a charge to AWS in the amount of \$135,861.12:

12/03/17	Amazon Web Services WEB SERVICES	AWS.Amazon.com	WA	\$135,861.12
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On or about December 20, 2017, the Merrills paid the outstanding balance, or thereabouts, on the Amex account, which included the unauthorized charge to AWS. This charge was later reversed after a fraud report.

15. In February 2018, Merrill's company, Riot Games, also contacted the FBI to advise that Google had reported similar fraudulent activity involving the use of stolen victim information to open a Google Cloud Services account and obtain and pay for cloud services, believed to be used for cryptocurrency mining. Like with AWS, the fraudulent Google account (#01450E-B5EE32-315DF9) (CLOUD ACCOUNT #1) was opened using the name Marc Merrill, his Amex credit card, ending in -93007, and the same fake email account, mnmerrill25@gmail.com (ACCOUNT #1). It was then utilized to also fraudulently purchase Google Cloud computing resources using a stolen or compromised credit card in order to mine cryptocurrency. Further, the Santa Monica, CA address provided for the account appears to be a property actually owned by Merrill.

16. According to information provided by Google, Merrill's Amex card was authorized on November 4, 2017, and thereafter used for 16 payments for cloud computing services through February 22, 2018. Google charged a total of approximately \$240,000, or thereabouts, to Merrill's Amex card for this fraudulent cloud services account, but nearly all of that amount was either later reversed/charged back or declined by the issuing bank.

17. Account statements for Merrill's Amex card show numerous sizeable transactions with Google for what appear to be cloud services. For example,

Credits				Amount
11/04/17	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$280.00
11/08/17	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$100.00
11/11/17	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$1,000.00
12/06/17	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$10,000.00
01/05/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$9,775.07
02/04/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$3,362.36
02/15/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$10,000.00
02/17/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$10,000.00
02/19/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$10,000.00
02/20/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$10,000.00
02/20/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$30,000.00
02/21/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$20,000.00
02/21/18	MARC MERRILL	GOOGLE *CLOUD_01450CC@GOOGLE.COM	CA	-\$20,000.00

18. According to records provided by Google, mnmerrill25@gmail.com (ACCOUNT #1) was created from a Singapore IP Address (27.125.180.127) on October 19, 2017.

19. Based on its independent inquiry, Google identified the suspect and actual user of mnmerrill25@gmail.com (ACCOUNT #1) as Matthew Ho, age 28 (DOB xx/xx/1990), of 8 Lantor Place, Singapore. Google further provided various additional linked accounts and identifiers it associated with Ho, including Microsoft accounts **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) and prefinity@outlook.jp (ACCOUNT #10), among others, as well as pertinent records, which investigators have reviewed.

20. According to Google, the recovery phone number for the fake Merrill email account mnmerrill25@gmail.com (ACCOUNT #1) also appears in association with an individual using the alias "prefinity" selling Bitcoin in Singapore on a cryptocurrency website: localbitcoins.com.³

³ Google initially identified the cryptocurrency website as localbitcoins.net. Upon further review, it appears that the correct website is localbitcoins.com.

1 LocalBitcoins Buy bitcoins Sell bitcoins Post a trade Forums Help + ☐ Sign up free ☐ Log

2 13354upi-bitcoin-barkovets-parovod-singapore-singapore. It is a snapshot of the page as it appeared on Dec 11, 2017 17:45:16 GMT.
Learn more

3 Tip: To quickly find your search term on this page, press Ctrl+F or ⌘+F (Mac) and use the find bar.

4 Buy bitcoins using Bank transfer Singapore with Singapore Dollar (SGD)

5 LocalBitcoins.com user **prefinity** wishes to sell bitcoins to you.

Price:	25,803.11 SGD / BTC	Terms of trade with prefinity Payment via FAST Bank Transfer or Direct Deposit via ATM Delivery will be sent immediately after confirming the transfer. (1-5mins) Available to trade 24 hours, drop a message on WhatsApp/Telegram to +1(714) 710-1977 if urgent. *Although usually not required, I reserve the right to request for ID verification, especially for bigger purchases so please prepare to send a copy if you intend to purchase in larger amounts.
Payment method:	Bank transfer Singapore <input type="checkbox"/>	
User:	<input type="checkbox"/> prefinity <small>(Feedback score 100 %, see feedback)</small>	
Trade limits:	200 - 8,008 SGD	
Location:	Singapore	
Payment window:	90 minutes <input type="checkbox"/>	

6

7

8

9

10 **How much you wish to buy?**

11 SGD BTC

12 21. Based on usage records (cookie overlap), Google identified several Google
13 email accounts and YouTube accounts that appear linked to the actual user of
14 mnmerrill25@gmail.com (ACCOUNT #1), including surrenderous@gmail.com
15 (ACCOUNT #2), matt@prefinity.com (ACCOUNT #3), faeianef@gmail.com (ACCOUNT
16 #4), xenatic@gmail.com (ACCOUNT #5), snzqdoggy@gmail.com (ACCOUNT #6), and
17 marcgashmore@gmail.com (ACCOUNT #7). According to Google, it is the service
18 provider for this prefinity.com account.

19 22. According to Google, the name on account faeianef@gmail.com (ACCOUNT
20 #4) is "Faeia," and formerly included a Singapore recovery phone number. The recovery
21 email address for the account is prefinity@outlook.jp (ACCOUNT #10). Notably, the
22 username "prefinity" reoccurs as the Bitcoin vendor on localbitcoins.com as well as in
23 relation to a Google email address also believed to be used by Ho, matt@prefinity.com
24 (ACCOUNT #3), described below.

25 23. According to Google records, the name on account surrenderous@gmail.com
26 (ACCOUNT #2) is Matthew Ho (DOB xx/xx/1990). The account has a Singapore recovery
27 phone number and a recovery email address of **advent@hotmail.co.jp** (SUBJECT
28 **ACCOUNT #9**), which, as discussed below, appears in relation to various other accounts

1 associated with Ho. Further, the name and address provided for the associated Google
2 Payments account is Ho Jun Jia, 8 Lentor Place, Singapore 788995.

3 24. According to Google records, the same Singapore IP Address (27.125.180.127)
4 used to create mnmerrill25@gmail.com (ACCOUNT #1) was also used to access
5 surrenderous@gmail.com (ACCOUNT #2) in August 2017. Moreover, the two accounts
6 share multiple login IP Addresses, which suggest that the same user is accessing both
7 accounts. Set forth below are some examples from Google records:

8 a. On November 27, 2017, at 03:10:37-UTC, a particular IP Address
9 (104.238.46.241) was used to log into the account surrenderous@gmail.com (ACCOUNT
10 #2). Approximately 15 minutes later, at 03:26:42-UTC, and on multiple other occasions the
11 same day, mnmerrill25@gmail.com (ACCOUNT #1) was accessed from that same IP
12 address (104.238.46.241).

13 b. On November 29, 2017, mnmerrill25@gmail.com (ACCOUNT #1) was
14 accessed approximately five times from an IP Address (119.74.28.26) that also was used to
15 log onto surrenderous@gmail.com (ACCOUNT #2) several days prior and on multiple
16 occasions in January 2018.

17 c. The final log on of mnmerrill25@gmail.com (ACCOUNT #1)
18 appearing on the Google records occurred on May 7, 2018, at 07:26:26-UTC, from a
19 particular IP Address (42.60.69.244). That same IP Address was used to access
20 surrenderous@gmail.com (ACCOUNT #2) on numerous occasions throughout April and
21 May 2018, which includes multiple instances on May 7, 2018, including at 06:51:22 and a
22 failed log in attempt at 06:55:53-UTC.

23 There are other examples of IP Address overlaps observed in the records.

24 25. According to Google records, the name on account matt@prefinity.com
25 (ACCOUNT #3) also is Matthew Ho (DOB xx/xx/1990). The account has a Singapore
26 recovery phone number⁴ and a recovery email address of **advent@hotmail.co.jp**

27 _____
28 ⁴ The recovery phone number is a different Singapore phone number than associated with
surrenderous@gmail.com (ACCOUNT #2).

1 (SUBJECT ACCOUNT #9), the same as associated with surrenderous@gmail.com
 2 (ACCOUNT #2). The name and address on the associated Google Payments account is
 3 Matthew Ho, 8 LENTOR PL, Singapore 788995, and has a registered Mastercard debit card
 4 issued in Singapore with cardholder name "Matthew Ho." The user of matt@prefinity.com
 5 (ACCOUNT #3) also has a YouTube account, under the name "Matthew Ho" (DOB
 6 xx/xx/1990). According to Google, a cloud account (#005FC3-CD09EC-426975) ("CLOUD
 7 ACCOUNT #2") is associated with matt@prefinity.com (ACCOUNT #3) and user Matthew
 8 Ho.

9 26. According to records provided by Google, matt@prefinity.com (ACCOUNT
 10 #3) also shares multiple login IP Addresses with both mnmerrill25@gmail.com (ACCOUNT
 11 #1) and surrenderous@gmail.com (ACCOUNT #2). For instance, the IP Address
 12 (104.238.46.241) used to access surrenderous@gmail.com (ACCOUNT #2) and
 13 mnmerrill25@gmail.com (ACCOUNT #1) on November 27, 2017, was also used to access
 14 matt@prefinity.com (ACCOUNT #3) on the same date. Account logs for
 15 matt@prefinity.com (ACCOUNT #3) also reflect usage of IP address (119.74.28.26), which
 16 as discussed above was used to access surrenderous@gmail.com (ACCOUNT #2) and
 17 mnmerrill25@gmail.com (ACCOUNT #1).

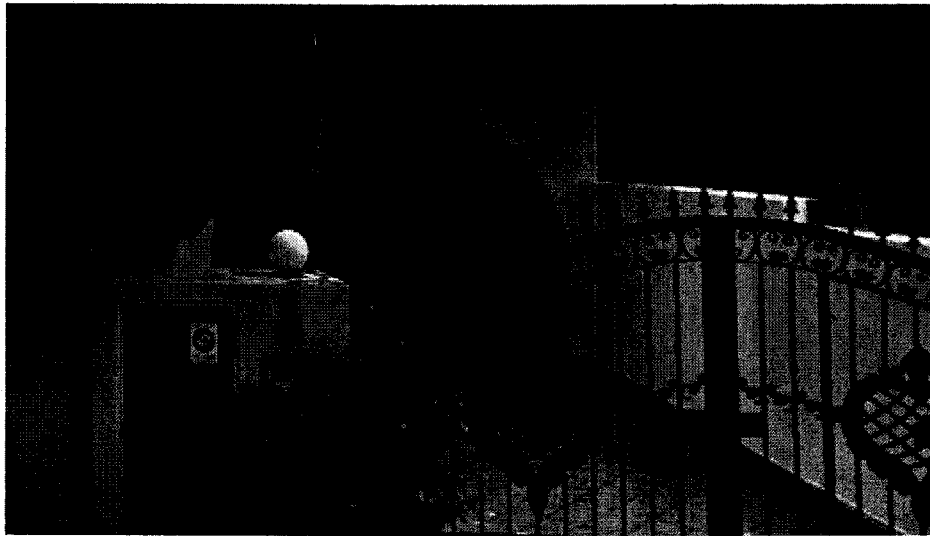
18 27. According to Google, email address advent@hotmail.co.jp (SUBJECT
 19 ACCOUNT #9), the common recovery email account for both ACCOUNTS #2 and #3,⁵ is
 20 linked to a particular Facebook profile, Facebook User ID 1224618568 (FACEBOOK
 21 ACCOUNT #1).

22 28. As part of the investigation, investigators have viewed the public aspects of
 23 FACEBOOK ACCOUNT #1. The name on the Facebook account is Matthew Ho. A
 24 prominent profile image on FACEBOOK ACCOUNT #1 shows various Mazda RX-7s.
 25
 26
 27

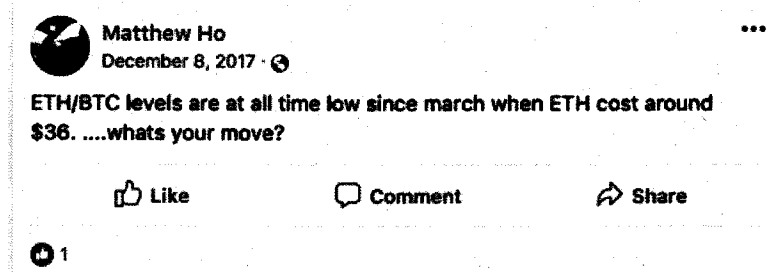
28 ⁵ The subscriber records for mnmerrill25@gmail.com (ACCOUNT #1) do not contain a recovery email address for the fake account.



Investigators have also conducted inquiries regarding Ho's suspected address, 8 Lentor Place, Singapore. Notably, what appears to be a Mazda RX-7 is visibly parked in the driveway of that residence on Google Maps street view:



29. From his posts on FACEBOOK ACCOUNT #1, Matthew Ho also indicates interest in cryptocurrency. For instance, on about December 8, 2017, Ho posted about the current price of Bitcoin (BTC) and Ethereum (ETH):



1 It is noteworthy that the criminal activity and suspected cryptocurrency mining that is the
 2 subject of this investigation was ongoing in December 2017 at the time of this post. It is
 3 further noteworthy that Ho asks others "whats your move?" while he also, it appears,
 4 actively sells cryptocurrency.

5 30. According to records obtained from Facebook, FACEBOOK ACCOUNT #1 is
 6 registered to Matthew Ho, with vanity name "inksandneedles" and registered email addresses
 7 **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) and **inksandneedles@facebook.com**.
 8 The account was created in January 2009. Moreover, various credit cards in the name of
 9 Matthew Ho are registered to FACEBOOK ACCOUNT #1,⁶ as is a PayPal account further
 10 linked to **ciel@projectquintessance.com** (ACCOUNT #8), discussed further below.

11 31. According to records obtained from Facebook, FACEBOOK ACCOUNT #1
 12 similarly shares multiple common login IP Addresses with **mnemerrill25@gmail.com**
 13 (ACCOUNT #1) and other online accounts known to be used by Ho, including 119.74.28.26
 14 and 42.60.69.244, discussed above. In fact, according to Facebook records, the Singapore IP
 15 Address (27.125.180.127) used to create the fraudulent account, **mnemerrill25@gmail.com**
 16 (ACCOUNT #1), was also used to access FACEBOOK ACCOUNT #1 leading into October
 17 2017, as illustrated below:

18 **IP Address 27.125.180.127**
 19 **Time 2017-10-12 15:01:49 UTC**
 20 **Action Login**
 21 ...
 22
 23
 24
 25
 26
 27
 28

⁶ There is also a credit card in another name registered to the Facebook account.

IP Address 27.125.180.127
Time 2017-09-01 04:17:33 UTC
Action Login

IP Address 27.125.180.127
Time 2017-08-30 07:29:32 UTC
Action Photo uploaded

IP Address 27.125.180.127
Time 2017-08-27 08:10:59 UTC
Action Photo uploaded

IP Address 27.125.180.127
Time 2017-08-27 07:30:26 UTC
Action Photo uploaded

IP Address 27.125.180.127
Time 2017-08-20 05:35:59 UTC
Action Login

By way of further example, according to record logs, on May 7, 2018 (UTC), both mnmmerrill25@gmail.com (ACCOUNT #1) and FACEBOOK ACCOUNT #1 were accessed using IP address 42.60.69.244 --- i.e., mnmmerrill25@gmail.com (ACCOUNT #1) at approximately 7:26 a.m. UTC:

Time	IP Address	Type
2018/05/07-07:26:26-UTC	42.60.69.244	Login

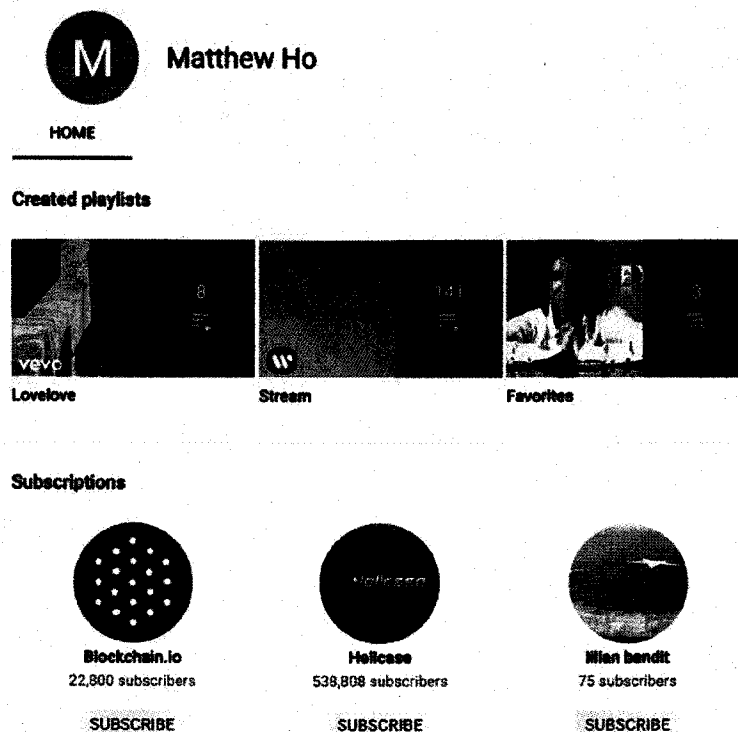
and FACEBOOK ACCOUNT #1 at approximately 8:01 a.m. UTC, as well as on multiple dates thereafter:

IP Address 42.60.69.244
Time 2018-05-07 08:01:31 UTC
Action Login

32. According to Google records, email address **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) is also the recovery email address for Google account ciel@projectquintessance.com (ACCOUNT #8). The name on the account also is Matthew Ho, and has the same recovery phone number as surrenderous@gmail.com (ACCOUNT #2). The user of ciel@projectquintessance.com (ACCOUNT #8) also maintains a YouTube account, which has posted a video of a Mazda RX-7 that appears similar to the vehicle, if not the same vehicle, parked at 8 Lantor Place, Singapore on Google Maps.



Additionally, the above referenced YouTube account bears the name Matthew Ho and shows at least one subscription to what appears to be cryptocurrency videos (Blockchain.io).



33. In July 2018, Microsoft provided records relating to **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) and **prefinity@outlook.jp** (ACCOUNT #10), which included limited information regarding e-mail, OneDrive, Skype, Xbox, and payment accounts.

Microsoft further advised that **prefinity@outlook.jp** (ACCOUNT #10) is an alias name for **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9). Specifically, according to the Microsoft return: "You have requested account **prefinity@outlook.jp**. Account **prefinity@outlook.jp** is an ALIAS of account **advent@hotmail.co.jp**; as such, we are providing the requested data for account **advent@hotmail.co.jp**." Investigators interpret this to mean that, because the two accounts are effectively one and the same, Microsoft only produced records for **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9).

34. According to records obtained from Microsoft, the registration information for **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) appears to reflect a registrant located in Japan:

Signin Name	First Name	Last Name	Region / State	Postal Code	Country	Time Zone
advent@hotmail.co.jp	れいな	宮咲	Tokyo-to	571-8501	Japan	Tokyo, Japan - JST

However, the payment profile records associated with **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) includes Matthew Ho of 8 Lentor Place, Singapore, and bears the ID: 83d44bcd-de56-464b-bc19-f586c50421a4:

Commerce Payment Instrument Records

Query For: **advent@hotmail.co.jp**

Query Type: AccountName

Profiles

First Name	Last Name	Microsoft Account	Billing Email	Type	Id
Matthew	Ho	advent@hotmail.co.jp	advent@hotmail.co.jp	consumer	83d44bcd-de56-464b-bc19-f586c50421a4
Matthew	Ho	advent@hotmail.co.jp	advent@hotmail.co.jp	Classic	-UFaIQAAAAABAACg
Matthew	Ho	advent@hotmail.co.jp	matt@prefinity.com	Classic	qUPe2wAAAAABAACg
Carolyn	Migliori	advent@hotmail.co.jp	noelamores@corestratos.com	Classic	osTlgEAAAAABAACg

Addresses

Address	Telephone	Id
8 Lentor Place , Singapore, , SG 788995		83d44bcd-de56-464b-bc19-f586c50421a4
950 Muschlitz Road , Nazareth, PA, US 18064		59a097db-b131-5589-08fa-09ddcfe82a09
950 Muschlitz Road , Nazareth, PA, US 18064		87ef3f0e-2a77-54ed-9196-bb6d21098f17

The records also identify **matt@prefinity.com** (ACCOUNT #3) as an alternative billing email to **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9).

35. The records obtained from Microsoft also included e-mail identifiers and header information (no content). This information revealed at least one communication sent between mnmerrill25@gmail.com (ACCOUNT #1) and advent@hotmail.co.jp (SUBJECT ACCOUNT #9):

From: Marc Merrill <mnmerrill25@gmail.com>
 Subject:
 To: Matthew Ho <advent@hotmail.co.jp>
 Date: 4/30/2018 1:41 AM

Notably, the username of advent@hotmail.co.jp (SUBJECT ACCOUNT #9) is Matthew Ho.

36. Additionally, the e-mail identifiers and header information included references to cryptocurrency. For instance, more specifically, the email headers for advent@hotmail.co.jp (SUBJECT ACCOUNT #9) indicate extensive communication with various cryptocurrency entities worldwide, including localbitcoins.com where, as discussed above, it is believed the target of this investigation marketed and sold cryptocurrency under the alias name “prefinity.”

Correspondents	Date
no-reply@localbitcoins.com	7/14/2017 8:26 AM
no-reply@localbitcoins.com	7/23/2017 2:13 PM
no-reply@localbitcoins.com	7/30/2017 1:33 AM
no-reply@localbitcoins.com	7/30/2017 12:30 PM
no-reply@localbitcoins.com	8/1/2017 7:20 AM
no-reply@localbitcoins.com	8/1/2017 7:25 AM
no-reply@localbitcoins.com	8/1/2017 6:51 PM
no-reply@localbitcoins.com	8/4/2017 12:07 PM
no-reply@localbitcoins.com	8/4/2017 12:34 PM
no-reply@localbitcoins.com	8/4/2017 1:23 PM
no-reply@localbitcoins.com	8/4/2017 1:26 PM
no-reply@localbitcoins.com	8/4/2017 1:46 PM
no-reply@localbitcoins.com	8/4/2017 1:47 PM
no-reply@localbitcoins.com	8/6/2017 2:52 PM
no-reply@localbitcoins.com	8/8/2017 10:04 AM
no-reply@localbitcoins.com	8/8/2017 10:26 AM
no-reply@localbitcoins.com	8/8/2017 10:27 AM

37. The records obtained from Microsoft further show that advent@hotmail.co.jp (SUBJECT ACCOUNT #9) regularly communicated with Google Cloud Services around

the timeframe of the fraudulent Google Cloud Services purchases previously provided by American Express, discussed above.

Correspondents	Date
• ← Google Cloud	4/10/2017 7:14 PM
• ← Google Cloud	4/17/2017 6:53 PM
• ← Google Cloud	4/24/2017 7:38 PM
• ← Google Cloud	8/14/2017 6:05 PM
• ← Google Cloud	8/28/2017 6:04 PM
• ← Google Cloud	9/5/2017 6:09 PM
• ← Google Cloud	9/20/2017 6:23 PM
• ← Google Cloud	9/26/2017 6:49 PM
• ← Google Cloud	11/16/2017 7:02 PM
• ← Google Cloud	12/4/2017 6:52 PM
• ← Google Cloud	2/11/2018 5:17 PM
• ← Google Cloud	2/27/2018 6:28 PM
• ← Google Cloud	3/6/2018 9:57 PM
• ← Google Cloud	3/12/2018 6:06 PM
• ← Google Cloud	3/14/2018 6:53 PM
• ← Google Cloud	3/26/2018 6:07 PM

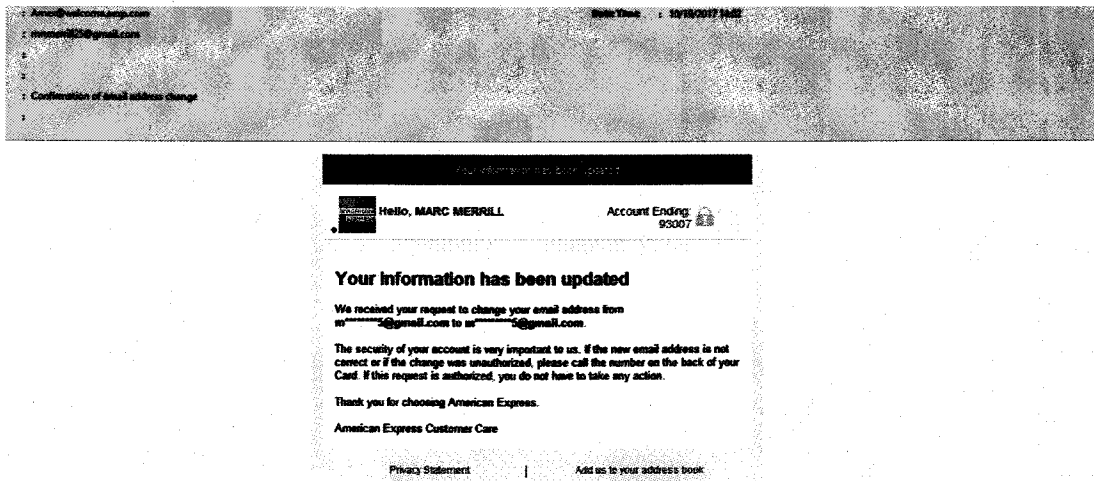
Based on my training and experience, and my involvement in this investigation, I believe that the contents of these and other communications include evidence of the criminal activity under investigation, and that various accounts described herein served as instrumentalities of the crime.

38. The IP connection logs for the account further link **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) to Matthew Ho and the fraudulent activity under investigation. For example, as discussed above, the final known log on of the fraudulent Google account **mnemerrill25@gmail.com** (ACCOUNT #1) according to records obtained to date occurred on May 7, 2018, from a particular IP Address (42.60.69.244). According to IP connection logs provided by Microsoft, between May 21, 2018 and June 11, 2018 (the date range provided), that same IP Address (42.60.69.244) was used to log into **advent@hotmail.co.jp** (SUBJECT ACCOUNT #9) on more than 50 occasions.

39. On about June 14, 2018, the Honorable Brian A. Tsuchida authorized search warrants for various accounts maintained by Google, namely, **mnemerrill25@gmail.com** (ACCOUNT #1), **surrenderous@gmail.com** (ACCOUNT #2), **matt@prefinity.com** (ACCOUNT #3), CLOUD ACCOUNT #1 and CLOUD ACCOUNT #2, discussed above.

1 Investigators recently received a partial production of responsive material from Google,
2 which is in the process of being reviewed, and await additional material that are forthcoming.

3 40. Preliminary review of the partial production of Google records revealed
4 communications and evidence related to the criminal activity under investigation. For
5 instance, mnmerrill25@gmail.com (ACCOUNT #1) contained a message confirming that the
6 e-mail address for Merrill's Amex account, ending in -93007, had been changed to
7 mnmerrill25@gmail.com (ACCOUNT #1):



17 Notably, this account information change occurred on October 19, 2017, immediately after
18 (and possibly the same day) mnmerrill25@gmail.com (ACCOUNT #1) was created.

19 41. Additionally, emails show that, within days of creating the fake account, the
20 user of mnmerrill25@gmail.com (ACCOUNT #1) used the account to impersonate Merrill,
21 to generated accounts in his name, and to attempt to access his accounts. For instance, the
22 suspect (Ho) appears to have used Merrill's identity to create obtain cryptocurrency mining-
23 related services. On about October 20, 2017, mnmerrill25@gmail.com (ACCOUNT #1)
24 received an email address to "Marc Merrill" from a contact@ccgmining.com, which appears
25 to convey an invoice:
26
27
28



Dear Marc Merrill,

This is a notice that an invoice has been generated on Friday, October 20th, 2017.

Your payment method is: PayPal

Invoice #876

Amount Due: \$29.49USD

Due Date: Friday, October 20th, 2017

Invoice Items

BITCOIN 200 GH/s \$29.49USD

Your Bitcoin Wallet: 1CmwcgazyFaWg1nVY2MBX1qkZx8oNWKBL

Sub Total: \$29.49USD

Credit: \$0.00USD

Total: \$29.49USD

You can login to your client area to view and pay the invoice at
<https://ccgmining.com/viewinvoice.php?i=876>

According to the company's website (www.ccgmining.com), CCG Mining provides information and services related to cryptocurrency and mining and markets itself as "an international company offering comprehensive solutions based on blockchain technology." On October 22, 2017, the suspect sent an email from mnmerrill25@gmail.com (ACCOUNT #1) that appears to be an attempt to gain access to Merrill's Amazon accounts, which, based on my training and experience, I know likely would contain additional personal and financial information:



Hi,

I am unable to log in, it tells me password is incorrect even after changing it. Kindly Assist.

Sent from Mail for Windows 10

42. On about July 3, 2018, the Honorable Mary Alice Theiler authorized a search warrant for Facebook User ID 1224618568 (FACEBOOK ACCOUNT #1), discussed above.

1 Investigators received and are in the process of examining responsive material from
2 Facebook.

3 43. Similar to the records provided by Google, a preliminary review of Facebook's
4 return identified evidence linking the user of FACEBOOK ACCOUNT #1 (Matthew Ho) to
5 the criminal activity under investigation. For instance, FACEBOOK ACCOUNT #1
6 contained conversations that appear to discuss cryptocurrency, account numbers, and the
7 need for credit cards with matching IDs.

8 **Author** Matthew Ho (1224618568)
9 **Sent** 2017-12-05 06:53:14 UTC
Body If you have the acc numbers

10 **Author** Matthew Ho (1224618568)
11 **Sent** 2017-12-05 06:53:09 UTC
Body But not an issue i can sell ethereum and deposit directly

12 **Author** Matthew Ho (1224618568)
13 **Sent** 2017-12-05 06:52:50 UTC
Body PREFERABLY 35

14 **Author** Aaron Chia (741926884)
15 **Sent** 2017-12-05 06:52:33 UTC
Body need to have one dollar inside nia right

16 **Author** Aaron Chia (741926884)
17 **Sent** 2017-12-05 06:52:21 UTC
Body easy to get also.

18 **Author** Matthew Ho (1224618568)
19 **Sent** 2017-12-05 06:52:00 UTC
Body I need debit or credit cards matching those ids

20 **Author** Aaron Chia (741926884)
21 **Sent** 2017-12-05 06:52:00 UTC
Body you need device spoofing all i can do

22 **Author** Aaron Chia (741926884)
23 **Sent** 2017-12-05 06:51:46 UTC
Body i have

24 **Author** Aaron Chia (741926884)
25 **Sent** 2017-12-05 06:51:45 UTC
Body you need sim cards

26 **Author** Aaron Chia (741926884)
27 **Sent** 2017-12-05 06:51:40 UTC
Body i have

28 **Author** Aaron Chia (741926884)
Sent 2017-12-05 06:51:36 UTC
Body look i need IDs

44. On August 8, 2018, AWS provided investigators with a copy of an internal investigation report relating to the fraudulent creation and use of Amazon retail and AWS cloud service accounts, including the MERRILL ACCOUNT. The AWS report identified

several accounts believed to be fraudulently created using Merrill's identity, which AWS identified as "Merrillot" (AWS) (the MERRILL ACCOUNT), "Merrillot2" (retail), "Corestratos" (retail), and "Mnmerrill" (retail). Through review of its records and open source information, AWS identified the suspect as "Matthew Ho (aka Ho Jun Jia, aka Jun Jia Ho)," who "appears to reside in Singapore and operates as a cryptocurrency vendor at times."

45. AWS also identified a second cryptocurrency vending site on which Ho appears to have been selling cryptocurrency. More specifically, according to the AWS report, "open source searches conducted on January 31, 2018, revealed the number [used to register the MERRILL ACCOUNT, namely, (714) 710-1077] was listed for the aliases 'Prefinity' (localbitcoins.com/accounts/profile/prefinity/) and 'Ethereum Vendor' (localethereum.com)."

46. The AWS report also provided a list of retail and AWS accounts registered to Ho, which included, among others, shorthand account identifiers "Project Quint" (AWS), "Prefinity" (retail), and "advent" (retail).⁷ According to AWS, the phone number for the Ho accounts is listed as contact information for a cryptocurrency vendor, along with the phone number used to register the fraudulently obtained AWS MERRILL ACCOUNT using mnmerrill25@gmail.com (ACCOUNT #1).

47. Investigators observed that the identifier "advent" reappears in the username of **advent@hotmail.co.jp (SUBJECT ACCOUNT #9)**. Further, "Project Quint" is notably similar to **ciel@projectquintessance.com (ACCOUNT #8)**, and "Prefinity" is, as discussed above, an alias used to sell cryptocurrency on localbitcoins.com and appears in other accounts attributed to Ho, such as **matt@prefinity.com (ACCOUNT #3)** and **prefinity@outlook.jp (ACCOUNT #10)**, which is the alias of **advent@hotmail.co.jp (SUBJECT ACCOUNT #9)**.

⁷ According to the AWS report, these identifiers were assigned by AWS in preparing the report. The basis is unknown to investigators.

1 48. AWS further identified as part of its internal investigation an individual by the
2 name of Aaron Chia as a possible accomplice of Matthew Ho. Notably, as noted above, Ho
3 regularly communicated with Aaron Chia via Facebook, at times about cryptocurrency.

4 49. Based on my training and experience, and my involvement in this
5 investigation, I believe that an individual known as "Matthew Ho" is the user of numerous
6 accounts discussed in this affidavit, including **SUBJECT ACCOUNT #9**, and that the
7 account records and information, including content, for **SUBJECT ACCOUNT #9** contain
8 evidence of the user's true name and identity, location, participation in the criminal activity
9 described herein, and possibly association and coordination with others. On about August 8,
10 2018, investigators submitted a preservation request to Microsoft regarding **SUBJECT**
11 **ACCOUNT #9** as well as prefinity@outlook.jp (**ACCOUNT #10**).

12 **BACKGROUND REGARDING MICROSOFT'S SERVICES**

13 50. Microsoft is an internet service provider that offers a variety of online services
14 including e-mail accounts (Outlook.com or Hotmail), cloud computing (Microsoft OneDrive
15 and Office), gaming services (Xbox), video conferencing (Skype) and other services. A
16 Microsoft account (formerly known as a Windows Live account) is what Microsoft
17 customers may use to sign into Microsoft services such as Outlook.com (or Hotmail), Office,
18 OneDrive, Skype, Xbox, Windows, and more. A user may create a Microsoft account with
19 any e-mail address (Microsoft accounts are not limited to those who use Microsoft e-mail
20 accounts) and a password and thereafter use that e-mail address and password to sign in to
21 any Microsoft program or service.

22 51. In my training and experience E-mail providers like Microsoft typically retain
23 certain transactional information about the creation and use of each account on their systems.
24 This information can include the date on which the account was created, the length of
25 service, records of log-in (i.e., session) times and durations, the types of service utilized, the
26 status of the account (including whether the account is inactive or closed), the methods used
27 to connect to the account (such as logging into the account via a website), and other log files
28 that reflect usage of the account. In addition, e-mail providers often have records of the

1 Internet Protocol address ("IP address") used to register the account and the IP addresses
2 associated with particular logins to the account. Because every device that connects to the
3 Internet must use an IP address, IP address information can help to identify which computers
4 or other devices were used to access the e-mail account, which can help establish the
5 individual or individuals who had dominion and control over the account

6 52. In general, an e-mail that is sent to a Microsoft subscriber is stored in the
7 subscriber's "mail box" on Microsoft's servers until the subscriber deletes the e-mail. If the
8 subscriber does not delete the message, the message can remain on Microsoft's servers
9 indefinitely. Even if the subscriber deletes the e-mail, it may continue to be available on
10 Microsoft's servers for a certain period of time.

11 53. When the subscriber sends an e-mail, it is initiated at the user's computer,
12 transferred via the Internet to Microsoft's servers, and then transmitted to its end destination.
13 Microsoft often maintains a copy of the e-mail sent. Unless the sender of the e-mail
14 specifically deletes the e-mail from Microsoft's server, the e-mail can remain on the system
15 indefinitely. Even if the sender deletes the e-mail, it may continue to be available on
16 Microsoft's servers for a certain period of time.

17 54. A sent or received e-mail typically includes the content of the message, source
18 and destination addresses, the date and time at which the e-mail was sent, and the size and
19 length of the e-mail. If an e-mail user writes a draft message but does not send it, that
20 message may also be saved by Microsoft but may not include all of these categories of data.

21 55. Microsoft provides a variety of online, or "cloud," services in addition to email
22 access, to the public and to customers who utilize hotmail accounts that are served by
23 Microsoft. Microsoft's various cloud services are associated with a single Microsoft
24 account, which is typically associated with a Microsoft email address, but can be associated
25 with any email address. The various cloud services provided by Microsoft are optional, and
26 can be turned "on" or "off" by the user.

27 56. In providing services such as Outlook, OneDrive, Xbox, calendar services,
28 online file storage, storage of browsing history, storage of search history, and locations

1 history, Microsoft collects information that constitute evidence of the crimes under
 2 investigation. For example, such evidence can be used to discover or confirm the identity
 3 and location users of the service at a particular time.

4 57. Microsoft is also able to provide information that will assist law enforcement
 5 in identifying other accounts associated with the SUBJECT ACCOUNT. In particular,
 6 Microsoft can provide information identifying and relating to other accounts used by the
 7 same subscriber. This information includes any forwarding or fetching accounts⁸ related to
 8 the SUBJECT ACCOUNT; all other Microsoft accounts linked to the SUBJECT ACCOUNT
 9 because they were accessed from the same computer (referred to as “cookie overlap”); all
 10 other Microsoft accounts that list the same SMS phone number⁹ as the SUBJECT
 11 ACCOUNT; all other Microsoft accounts that list the same recovery email addresses as the
 12 SUBJECT ACCOUNT; and all other Microsoft accounts that share the same creation IP
 13 addresses¹⁰ as the SUBJECT ACCOUNT. This information will assist law information in
 14 determine who controls the SUBJECT ACCOUNT and in identifying other accounts utilized
 15 by the malware scheme.

16 **INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

17 58. Pursuant to Title 18, United States Code, Section 2703(g), this application and
 18 affidavit for a search warrant seeks authorization to permit Microsoft, and its agents and
 19 employees, to assist agents in the execution of this warrant. Once issued, the search warrant
 20 will be presented to Microsoft with direction that it identify the Microsoft account described
 21 in Attachment A to this affidavit, as well as other subscriber and log records associated with
 22 the account, as set forth in Section I of Attachment B to this affidavit.

23
 24
 25 ⁸ A forwarding or fetching account related to one of subject accounts would be a separate email
 account that can be setup by the user to receive copies of all of the email sent to the subject account.

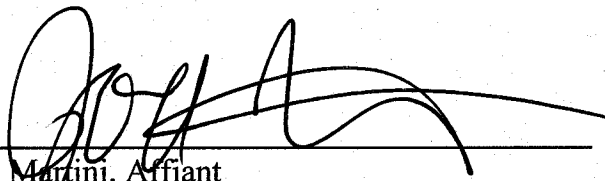
26 ⁹ The SMS phone number of a Microsoft account is used by Microsoft as an additional security
 27 precaution to verify the identity of the user by sending a text message with a code that must be
 entered in addition to the password to log into the account. This ensures that only a person with both
 28 the password and the phone tied to the SMS phone number can make changes to the account.

¹⁰ The creation IP address is the IP address from which the Microsoft account was created.

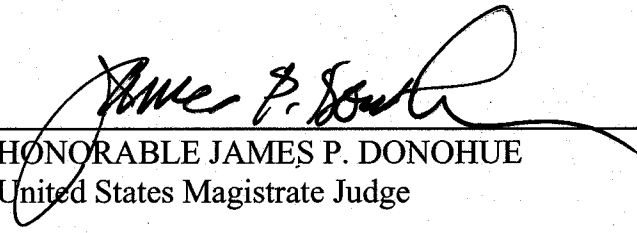
1 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or
2 execution of this warrant. Accordingly, by this Affidavit and Warrant I seek authority for
3 the government to search all of the items specified in Section I, Attachment B (attached
4 hereto and incorporated by reference herein) to the Warrant, and specifically to seize all of
5 the data, documents and records that are identified in Section II to that same Attachment.

6 **REQUEST FOR SEALING**

7 63. I further request that the Court order that all papers in support of this
8 application, including the affidavit and search warrant, be sealed until further order of the
9 Court. These documents discuss an ongoing criminal investigation that is neither public nor
10 known to all of the target(s) of the investigation. Accordingly, there is good cause to seal
11 these documents because their premature disclosure may seriously jeopardize that
12 investigation.

13
14
15 
16 Joel Martini, Affiant
17 Special Agent
18 Federal Bureau of Investigation

19 SUBSCRIBED and SWORN to before me this 15th day of August, 2018.

20
21 
22 HONORABLE JAMES P. DONOHUE
23 United States Magistrate Judge
24
25
26
27
28

ATTACHMENT A

Account to be Searched

The electronically stored data, information and communications contained in, related to, and associated with, including all preserved data, the following account:

advent@hotmail.co.jp ("SUBJECT ACCOUNT")

as well as all other subscriber and log records associated with the account, which are located at premises owned, maintained, controlled or operated by Microsoft Corporation ("Microsoft"), an e-mail and service provider headquartered in Redmond, Washington.

ATTACHMENT B

Items to be Seized

I. Section I - Information to be disclosed by Microsoft, for search:

To the extent that the information described in Attachment A is within the possession, custody, or control of Microsoft, regardless of whether such information is located within or outside of the United States, including any messages, records, files, logs, or information that have been deleted but are still available to Microsoft, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Microsoft is required to disclose the following information to the government for each account or identifier listed in Attachment A:

a. The contents of all e-mails associated with the account January 1, 2017 to the present, including stored or preserved copies of e-mails sent to and from the account, draft e-mails, the source and destination addresses associated with each e-mail, the date and time at which each e-mail was sent, and the size and length of each e-mail;

b. All records or other information regarding the identification of the account, to include full name, physical address, telephone numbers and other identifiers, records of session times and durations, the date on which the account was created, the length of service, the IP address used to register the account, log-in IP addresses associated with session times and dates, account status, alternative e-mail addresses provided during registration, methods of connecting, log files, and means and source of payment (including any credit or bank account number);

c. The types of service utilized;

d. All records or other information stored at any time by an individual using the account, including address books, contact and buddy lists, calendar data, pictures, and files;

e. all GPS, Wi-Fi, or cell tower proximity records related to the account and/or account contents;

f. any Microsoft Groups information and/or records including member lists, e-mail addresses of members, messages, files, calendars, database content, and

1 | photographs;

2 | g. any Microsoft Chat/Messenger information and/or records, including
3 | any Microsoft Chat/Messenger Friends list, time, date, and IP address logs for Chat and
4 | Messenger use, and any archived web messenger communications stored on Microsoft
5 | servers;

6 | h. any Flickr content including Flickr e-mail, photographs and user
7 | comments, IP address and timestamp of content uploaded to account;

8 | i. All records pertaining to communications between the Provider and any
9 | person regarding the account, including contacts with support services and records of actions
10 | taken.

11 | This Search Warrant also requires Microsoft to produce the following information for
12 | accounts associated with any of the Target Accounts (collectively the "Linked Subject
13 | Accounts"):

14 | a. a list of all other accounts linked to the SUBJECT ACCOUNT because
15 | of cookie overlap with any SUBJECT ACCOUNT;

16 | b. a list of all other accounts that list the same SMS phone number as any
17 | of the SUBJECT ACCOUNT;

18 | c. a list of all other accounts that list the same recovery email address as
19 | any of the SUBJECT ACCOUNT;

20 | d. a list of all other accounts that shared the same creation IP address as
21 | any of the SUBJECT ACCOUNT within 30 days of creation;

22 | e. Subscriber records for each of the Linked Subject Accounts including 1)
23 | names, email addresses, and screen names; 2) physical addresses; 3) records of session times
24 | and durations; 4) length of service (including start date) and types of services utilized; 5)
25 | telephone or instrument number or other subscriber number or identity, including any
26 | temporarily assigned network address such as internet protocol address, media access card
27 | addresses, or any other unique device identifiers recorded by Microsoft in relation to the
28 | account; 6) account log files (login IP address, account activation IP address, and IP address

1 history); 7) detailed billing records/logs; 8) means and source of payment; and 9) lists of all
2 related accounts.

3
4 NOTE: The Provider is hereby ordered to disclose the above information to the government
5 within **14 days** of service of this warrant.

6 **II. Section II - Information to be seized by the government**

7 All information described above in Section I that constitutes fruits, contraband,
8 evidence and instrumentalities of violations of Title 18 United States Code, Sections
9 1028(a)(7) (Identity Theft); 1028A (Aggravated Identity Theft); 1029(a)(2) (Access Device
10 Fraud); 1030(a)(4) (Computer Fraud); 1343 (Wire Fraud); and 1956 (Money Laundering),
11 those violations occurring between approximately October 2017 and the present, including,
12 for each account or identifier listed on Attachment A, information pertaining to the following
13 matters:

- 14 a. Content that serves to identify any person who uses or accesses the
15 account or who exercises in any way any dominion or control over the account;
- 16 b. Content relating to or referring to the name "Merrill";
- 17 c. Content relating to or referring to "Riot Games";
- 18 d. Content relating to the creation or use of mnmerrill25@gmail.com;
- 19 e. Content relating to the creation of an account at an email or cloud
20 services provider, including Google, Amazon, or Amazon Web Services;
- 21 f. Content relating to the data usage of cloud services account;
- 22 g. Content relating to acquisition, mining, purchase, sale, or transfer of
23 cryptocurrency, such as Bitcoin and Ethereum, including use of or access to cryptocurrency
24 wallets or mining-related material;
- 25 h. Content referencing or relating to cryptocurrency vending websites,
26 such as localbitcoins.com and localethereum.com;
- 27 i. Content relating to use of monikers "Prefinity" or "Ethereum Vendor";
- 28 j. Content relating to the creation or maintenance of domain

1 “prefinity.com”;

2 k. Content relating to cloud computing services and the acquisition,
3 maintenance, or use of related accounts;

4 l. Content relating to communications with Amazon, Amazon Web
5 Services, or Google Cloud Services;

6 m. Content that identifies victims of identity theft perpetrated by the
7 account holder or his/her associates;

8 n. Content that constitute communications in furtherance of the crimes
9 enumerated above;

10 o. Content that may identify assets including bank accounts, commodities
11 accounts, trading accounts, cryptocurrency wallets, personal property and/or real estate that
12 may represent proceeds of computer intrusion activity or fraud or are traceable to such
13 proceeds;

14 p. Content that may reveal the current or past location of the individual or
15 individuals using the account;

16 q. Content that may reveal the identities of and relationships between co-
17 conspirators;

18 r. Content that may identify any alias names, online user names, “handles”
19 and/or “nics” of those who exercise in any way any dominion or control over the specified
20 account as well as records or information that may reveal the true identities of these
21 individuals;

22 s. Other log records, including IP address captures, associated with the
23 specified account;

24 t. Subscriber records associated with the specified account, including 1)
25 names, e-mail addresses, and screen names; 2) physical addresses; 3) records of session
26 times and durations; 4) length of service (including start date) and types of services utilized;
27 5) telephone or instrument number or other subscriber number or identity, Including any
28 temporarily assigned network address such as internet protocol address, media access card

1 addresses, or any other unique device identifiers recorded by Microsoft in relation to the
2 account; 6) account log files (login IP address, account activation IP addresses, and IP
3 address history); 7) detailed billing records/logs; 8) means and source of payment; and 9)
4 lists of all related accounts;

5 u. Records of communications between Microsoft and any person
6 purporting to be the account holder about issues relating to the account, such as technical
7 problems, billing inquiries, or complaints from other users about the specified account. This
8 to include records of contacts between the subscriber and the provider's support services, as
9 well as records of any actions taken by the provider or subscriber as a result of the
10 communications.

11 v. Android identification number, MEID, and cellular telephone number
12 Information identifying accounts that are linked or associated with the account.

13 w. Android identification number, MEID, and cellular telephone number
14 Information identifying accounts that are linked or associated with the account.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC BUSINESS
RECORDS PURSUANT TO FEDERAL RULE OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Microsoft Corporation (Microsoft), and my official title is _____. I am a custodian of records for Microsoft. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Microsoft and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;

b. such records were kept in the ordinary course of a regularly conducted business activity of Microsoft; and

c. such records were made by Microsoft as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date: _____

Signature